

EXHIBIT “A”

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Attorneys for Plaintiff
CLAIDE MANUEL

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

CLAIDE MANUEL

Plaintiff,

vs.

TARGET CORPORATION.; JOHN DOES
1-10; JANE DOES 1-10; DOE
PARTNERSHIPS 1-10; DOE
CORPORATIONS 1-10; and DOE
GOVERNMENTAL ENTITIES 1-10,

Defendants.

CIVIL NO. _____
(Non-Motor Vehicle Tort)

COMPLAINT; SUMMONS

COMPLAINT

Comes now Plaintiff CLAIDE MANUEL above named, by and through his attorneys, Glenn T. Honda, and George C. Alejandro, for causes of action against Defendants, alleges and avers as follows:

1. At all times material to this Complaint, Plaintiff CLAIDE MANUEL (hereinafter referred to as "Plaintiff" or "MR MANUEL"), is and was a resident of the City and County of Honolulu, State of Hawaii.

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2. At all times material to this Complaint, Defendant TARGET CORPORATION (hereinafter “Defendant” or “Target”) is and was a foreign profit corporation doing business in the City and County of Honolulu, State of Hawaii.

3. All events material to this Complaint occurred within the City and County of Honolulu, and within the jurisdiction of the Circuit Court of the First Circuit, State of Hawaii.

4. Plaintiff reviewed records of the Department of Commerce and Consumer Affairs in order to ascertain the true and full names and identities of all Defendants in this action, but has no further knowledge or information regarding the parties responsible and is unable to ascertain the identity of the Defendants in this action designated as JOHN DOES 1-10, JANE DOES 1-10, DOE PARTNERSHIPS 1-10, DOE CORPORATIONS 1-10 and DOE GOVERNMENT ENTITIES 1-10 (hereinafter collectively referred to as “Doe Defendants”); said Defendants are sued hereunder under fictitious names for the reason that their true names and identities are unknown to Plaintiff except that they may be connected in some manner with Defendants and may be agents, servants, employees, employers, representatives, co-venturers, associates, or independent contractors of Defendants and/or were in some manner presently unknown to Plaintiff engaged in the activities alleged herein and/or were in some manner responsible for the injuries or damages to Plaintiff and their “true names, identities, capacities, activities, and/or responsibilities” are presently unknown to Plaintiff or his attorneys.

5. On or about November 18, 2022, MR. MANUEL, was a customer at TARGET located at 345 Hahani Street, Kailua, Hawaii (the “Store”).

6. On or about November 18, 2022, the Store was operated by, in the possession of and/or under the control of TARGET CORPORATION.

7. As a possessor of land, Defendant TARGET CORPORATION, owes a duty of care to all persons which it should reasonably anticipate to be on its premises, such that said persons are not exposed to an unreasonable risk of harm.

8. On or about November 18, 2022, MR. MANUEL, a customer at the store, was a person whom TARGET CORPORATION, reasonably should have expected to be on its premises.

9. On or about November 18, 2022, Defendant TARGET CORPORATION, breached its duty of care by failing to properly design, clean, furnish, construct and/or maintain the walking surfaces and/or walking areas in or around the store, such that it thereby allowed said walking areas to pose an unreasonable risk of harm to the store's customers, including MR. MANUEL.

10. Defendant TARGET CORPORATION, breach of its duty of care as set forth herein constituted negligence.

11. As a result of Defendant TARGET CORPORATION's negligence, MR. MANUEL slipped and fell and was thereby injured while walking into the store.

12. As a direct and proximate cause of the negligence of Defendant TARGET CORPORATION's and/or one or more of the DOE DEFENDANTS, jointly and/or severally, MR. MANUEL, suffered serious bodily injury, severe pain and suffering, severe emotional distress, past and future loss wages, medical and/or rehabilitative expenses and/or special damages and amounts to be proven at trial.

WHEREFORE, Plaintiff herein demands judgment against Defendants as follows:

- A. General damages in amounts to be proven at the time of trial;
- B. Special damages in amounts which will be proved at trial;

C. Attorney's fees, costs of suit, pre-judgment interest from the date of the accident, and such other and further relief as this Court deems just and proper.

DATED: Honolulu, Hawaii, August 9, 2022

/s/ *George C. Alejandro*

GLENN T. HONDA
GEORGE C. ALEJANDRO
Attorney for Plaintiff
CLAIDE MANUEL

STATE OF HAWAII CIRCUIT COURT OF THE FIRST CIRCUIT	SUMMONS TO ANSWER CIVIL COMPLAINT	CASE NUMBER
PLAINTIFF CLAIDE MANUEL	VS.	DEFENDANT(S) TARGET CORPORATION.; JOHN DOES 1-10; JANE DOES 1-10; DOE PARTNERSHIPS 1-10; DOE CORPORATIONS 1-10; and DOE GOVERNMENTAL ENTITIES 1-10
PLAINTIFF'S NAME & ADDRESS, TEL. NO. CLAIDE MANUEL c/o Glenn T. Honda, George C. Alejandro and James H. Monma Recovery Law Center 770 Kapiolani Blvd., Suite 111 Honolulu, Hawaii 96813		
<p>TO THE ABOVE-NAMED DEFENDANT(S)</p> <p>You are hereby summoned and required to file with the court and serve upon</p> <p>Glenn T. Honda, George C. Alejandro and James H. Monma Recovery Law Center 770 Kapiolani Blvd., Suite 111 Honolulu, Hawaii 96813</p> <p>plaintiff's attorney, whose address is stated above, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the date of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.</p> <p>THIS SUMMONS SHALL NOT BE PERSONALLY DELIVERED BETWEEN 10:00 P.M. AND 6:00 A.M. ON PREMISES NOT OPEN TO THE GENERAL PUBLIC, UNLESS A JUDGE OF THE ABOVE-ENTITLED COURT PERMITS, IN WRITING ON THIS SUMMONS, PERSONAL DELIVERY DURING THOSE HOURS.</p> <p>A FAILURE TO OBEY THIS SUMMONS MAY RESULT IN AN ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST THE DISOBEYING PERSON OR PARTY.</p>		
The original document is filed in the Judiciary's electronic case management system which is accessible via eCourt Kokua at: http://www.courts.state.hi.us	Effective Date of 28-Oct-2019 Signed by: /s/ Patsy Nakamoto Clerk, 1st Circuit, State of Hawai'i <div data-bbox="1224 1524 1377 1671" data-label="Image"> </div>	
<div data-bbox="94 1701 220 1818" data-label="Image"> </div> In accordance with the Americans with Disabilities Act, and other applicable state and federal laws, if you require a reasonable accommodation for a disability, please contact the ADA Coordinator at the Circuit Court Administration Office on OAHU- Phone No. 808-539-4400, TTY 808-539-4853, FAX 539-4402, at least ten (10) working days prior to your hearing or appointment date.		